

KAREN L. LOEFFLER
United States Attorney

AUDREY J. RENSCHEN
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
Email: audrey.renschen@usdoj.gov

RAVI SINHA
Trial Attorney
United States Department of Justice
Criminal Division, Child Exploitation and Obscenity Section
1400 New York Avenue NW, Sixth Floor
Washington, D.C. 20005
202-353-4698 (direct)
ravi.sinha@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:13-CR-00097-SLG-KFM
)	
Plaintiff,)	<u>COUNT 1:</u>
)	SEXUAL EXPLOITATION OF A CHILD
vs.)	—PRODUCTION OF CHILD
)	PORNOGRAPHY
JASON JAYAVARMAN,)	Vio. of 18 U.S.C. §§ 2251(c) and (e)
)	
Defendant.)	<u>COUNT 2:</u>
)	TRAVEL WITH INTENT TO ENGAGE
)	IN ILLICIT SEXUAL CONDUCT
)	Vio. of 18 U.S.C. §§ 2423(b and (e)
)	

S U P E R C E D I N G I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

**Sexual Exploitation of a Child –
Production of Child Pornography**

Between on or about April 7, 2010 and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, did, and did attempt to, employ, use, persuade, induce, entice, and coerce a minor child to engage in any sexually explicit conduct outside of the United States for the purpose of producing a visual depiction of such conduct and thereafter transported such visual depiction to the United States by any means, including by using any means or facility of interstate or foreign commerce.

All of which is in violation of Title 18 U.S.C. §§ 2251(c) and (e).

COUNT 2

**Travel with Intent to
Engage in Illicit Sexual Conduct**

Between on or about April 23, 2013 and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, a United States citizen, did attempt to travel in foreign

commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person.

All of which is in violation of Title 18 U.S.C. §§ 2423(b) and (e).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Audrey J. Renschen
AUDREY J. RENSCHEN
United States of America
Assistant U.S. Attorney

s/ Audrey J. Renschen for
RAVI SINHA
United States of America
TRIAL ATTORNEY

s/ Frank V. Russo for
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: 9/16/14